

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC., FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY, CHICAGO
21 TITLE INSURANCE COMPANY, and CHICAGO TITLE OF
22 NEVADA, INC.

23 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
24 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

25 Gary L. Compton, State Bar No. 1652
26 2950 E. Flamingo Road, Suite L
27 Las Vegas, Nevada 89121

28 **UNITED STATES DISTRICT COURT**

DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00971-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Fidelity National Title Insurance Company (“Fidelity”), Chicago Title Insurance Company (“Chicago Title”) and Chicago Title of Nevada, Inc. (“Chicago Agency”) (collectively “Defendants”) and plaintiff Bank of America, N.A. (“BANA”), by and through their respective attorneys of record, which hereby

1 agree and stipulate as follows:

2 1. On May 19, 2021 BANA filed its complaint in the Eighth Judicial District Court
3 for the State of Nevada;

4 2. On May 20, 2021, Chicago Title removed the instant case to the United States
5 District Court for the State of Nevada (ECF No. 1);

6 3. Chicago Agency's response to BANA's complaint is currently due on June 24,
7 2021, Chicago Title and Fidelity's responses are currently due on June 28, 2021, while FNTG's
8 response is currently due on June 29, 2021;

9 4. Counsel for Defendants request a 30-day extension for FNTG (35 days for Chicago
10 Agency and 31 days for Chicago Title and Fidelity) through and including Thursday, July 29,
11 2021 for Defendants to file their respective responses to BANA's complaint to afford Defendants'
12 counsel additional time to review and respond to BANA's complaint.

13 5. Counsel for BANA does not oppose the requested extension;

14 6. This is the first request for an extension made by counsel for Defendants, which is
15 made in good faith and not for the purposes of delay.

16 7. This stipulation is entered into without waiving any of Defendants' objections
17 under Fed. R. Civ. P. 12.

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Thursday, July 29, 2021.

3 Dated: June 23, 2021

SINCLAIR BRAUN LLP

4
5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
9 INC., FIDELITY NATIONAL TITLE
10 INSURANCE COMPANY, CHICAGO
11 TITLE INSURANCE COMPANY and
12 CHICAGO TITLE OF NEVADA, INC.

13 Dated: June 23, 2021

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Darren T. Brenner

15 DARREN T. BRENNER
16 Attorneys for Plaintiff
17 BANK OF AMERICA, N.A.

18 **IT IS SO ORDERED.**

19 Dated this 23rd day of June, 2021.

20
21 
22 ELAYNA J. YOUCHAK
23 UNITED STATES MAGISTRATE JUDGE
24
25
26
27
28